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September 25, 2024

Honorable Arun Subramanian
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

VIA ECF

Re: United States v. Avraham Eisenberg
23 Cr. 10 (AS)

Dear Judge Subramanian:

On August 5, 2024, defendant Avraham Eisenberg (“Eisenberg”) filed a 70 page post-trial motion. The government responded on September 17, 2024 with a 62 page brief. Eisenberg’s reply is currently due on October 1, 2024. Although Eisenberg does not anticipate his reply to be of the length of the prior submissions, he intends to address numerous complicated issues raised in the government’s response. The reply process, including meeting with Eisenberg at the Metropolitan Detention Center, is, and will be, time consuming. For this this reason, Eisenberg respectfully requests a one week extension of his submission date to October 8, 2024. This requested period contemplates the intervening Jewish Holiday. The government, by Assistant United States Attorney Thomas Burnett, does not oppose this application.

Thank you for Your Honor’s consideration of this request.

Very truly yours,

Sanford Talkin
Sanford Talkin

cc: AUSA Thomas Burnett (by ECF)
AUSA Peter Davis (by ECF)
SAUSA Tian Huang (by ECF)